

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: : **CHAPTER 13**
YONGPING WANG :
DEBTOR :
: **BANKRUPTCY NO.: 19-16681- AMC**

RESPONSE TO CERTIFICATION OF DEFAULT

Debtor ("Respondent"), by their attorney, Brandon J. Perloff, Esq. by way of Response to Movant's Certification of Default respectfully represents the following:

1. Debtor has the funds available to cure any alleged default.
2. Debtor intends to cure any alleged default immediately, and will, through his attorney, coordinate with the Movant to tender any monies that are alleged due at this time in order to bring the account current.

WHEREFORE, Debtor prays that a hearing be set on the matter, prior to which any alleged default will be cured.

Date: April 4, 2023

/s/ Brandon J. Perloff
Brandon J. Perloff Esquire.
Attorney for Debtor